

August 22, 2000

Via Certified Mail No.7000 0520 0023 5049 1697

Jerry Jones, President  
Seelyville Town Council  
P. O. Box 249  
Seelyville, Indiana 47878

Dear Mr. Jones:

Re: Seelyville Water Works  
PWSID No. 5284011

This letter will address compliance with the terms the Commissioner's Order dated July 14, 2000. In a letter dated July 21, 2000, you submitted a plan to correct the pressure deficiencies in the eastern portion of the Seelyville water distribution system. Based on subsequent conversations with your engineers, Hannum, Wagle & Cline, a schedule for the implementation of the improvements for the eastern portion of the system was submitted in a letter dated August 9, 2000. IDEM is revising the schedule as outlined below to incorporate a number of days after receiving the permit instead of a specific date for steps 3-5:

1.	Begin Design	August 2, 2000
2.	Submit Plans, Specifications and permit application to IDEM	August 24, 2000
3.	Order material/solicit bids for work	within 5 days of receipt of construction permit
4.	Begin Construction	within 45 days of receipt of construction permit
5.	Complete Construction/begin operation	Within 75 days of receipt of construction permit

In a letter dated July 31, 2000, you submitted a plan to correct the pressure

deficiencies in the western portion of the Seelyville water distribution system. This plan included the construction of a storage tank. While we believe the construction of an additional storage tank will improve pressure in the western portion of the system, we feel that some main replacement may be necessary to address all pressure concerns. Your west side plan needs to be modified to address those low pressure areas. Within fifteen (15) days of the receipt of this correspondence, you are to submit, in writing, a modified plan which addresses all of the above mentioned concerns and a new schedule for the implementation of the project for western portion of the system.

Plant operation has been regularly monitored by IDEM staff. The filter manufacturer has evaluated the filters and found them to be within their design parameters. Recent activities at the plant have focused on the operation of the filters. IDEM representatives and Seelyville personnel have made modifications to the chemical injection points, chemical feed rate, and reducing flow rate on the raw water treatment pumps to meet the filtration rate as recommended by the Ten States Standards. As a result, the iron and manganese levels leaving the plant have come down below the secondary levels, at the same time the backwash flow rate and filter channeling problems noted previously were controlled. However, IDEM has a growing concern about existing filter capacity meeting system demand. It is recommended that Seelyville explore this capacity issue both as a way to address immediate problems and for long term planning for future needs. Currently the plant is taken off line during the backwash process. The addition of more filter capacity would allow the plant to remain in operation during the filter backwash process. Some additional operational items are necessary including a flow meter for the raw water pumps needs to be installed to determine accurate rate of flow to the filters. A replacement flow meter for the high service pumps also needs to be installed. Within thirty (30) days of the receipt of this correspondence, you are to submit, in writing, a plan which addresses the above mentioned concerns and schedule for the installation of flow meters.

IC 13-18-11-10.5 states, in substance, that all water treatment plants and water distribution systems, whether publicly or privately owned, must be under the supervision of an operator whose competency is certified to by the commissioner in a classification corresponding to the classification of the plant or distribution system to be supervised.

327 IAC 8-11-1 states, in relevant part, that all purification or treatment works producing water to be used, or available for drinking purposes by the public, shall be properly operated under the supervision of a competent operator or superintendent.

327 IAC 8-12-3(g) states, in substance, that an operator may be designated as being in responsible charge of more than one (1) water plant or more than one (1) water distribution system, if it can be shown that he will give adequate supervision to all units involved. Adequate supervision means that sufficient time is spent at the plant on a regular

basis to assure that the operator is knowledgeable of the actual operations and that test reports and results are representative of the actual operational conditions.

Your system is classified as a PF plant, that is, a plant using chemical feed to achieve disinfection, fluoride standardization, or water stabilization plus pressure or gravity filtration to treat well water sources for iron, manganese or hydrogen sulfide removal and/or cation exchange softening regardless of population. In addition, you operate a distribution system (DS) serving less than fifteen thousand (15,000) people.

The required qualifications for a certified operator of a PF plant includes a high school diploma or its equivalent. That person must possess the educational skills necessary to handle fractions and decimals, read a linear scale, calculate volumes of simple shapes, make simple computation of multiplication and division, keep records, read and write the English language to the extent of interpreting service manuals and work orders and submitting written reports, and understand basic principles of sanitation. In addition he must be able to maintain inventories, order supplies or equipment, and interpret chemical and bacteriological sample reports. Furthermore, he must have had a minimum of two (2) years of acceptable work experience in the operation of a Class PF water treatment plant. Successful completion of educational work at college level in engineering chemistry, or science related to water treatment may be substituted for work experience at the ratio of four (4) semesters or six (6) quarters of schooling for a total of one (1) year of experience.

Rules recently adopted by the Water Pollution Control Board will require that a certified operator be available for the facility in case of emergency seven (7) days a week, twenty-four (24) hours a day. Otherwise, under normal operating conditions, the certified operator must maintain, evaluate, and record the performance of the system during regular and routine visits. Daily testing may be completed by a dependable person under the direction of the certified operator, however, the operator must personally monitor the system a minimum five (5) times per week. The owner or governing body of a water treatment system or water distribution system is ultimately responsible for ensuring the continuous operation and maintenance of the system so that water is safe in quality, clean and adequate in quantity, and chemically satisfactory for ordinary domestic consumption.

Based on our evaluation of Seelyville's plant and the events of the past several months, we believe it is necessary for the plant to be staffed by qualified personnel at a greater frequency than is currently done. Within fifteen (15) days of the receipt of this correspondence, you are to submit, in writing, a plan and schedule for increasing the oversight of the facility by qualified personnel to ensure that water is safe in quality, clean and adequate in quantity, and chemically satisfactory for ordinary domestic consumption. Additionally, during the week of August 7, 2000, the certified operator of record was not

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available at the water treatment plant. You are to provide, in writing within seven (7) days, the name of the certified operator in responsible charge during that time, the certification number, and the amount of time spent by the operator at the Seelyville plant.

If you have any questions concerning this notice, you may contact Liz Melvin, Drinking Water Branch, at the above address or by phone at 317/308-3366.

Sincerely,

Matthew C. Rueff  
Assistant Commissioner  
Office of Water Management

cc: Vigo County Health Department  
Marvin Perkins, Certified Operator, Seelyville Water Works  
Timothy Fears, Esq., Wright Shagley & Lowery